

U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
FILED

SEP 03 2019

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

UNITED STATES OF AMERICA)
)
v.)
)
AMBER MICHELE DAVIS)

IN OPEN COURT
JAMES W. MCCORMACK, CLERK
BY: *[Signature]*
DEPUTY CLERK
No. 4:19CR00335-DPM
18 U.S.C. § 1343

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

A. BACKGROUND

At all material times:

1. The defendant, AMBER MICHELE DAVIS, was acquainted with John Rogers and Individual 1.

2. AMBER MICHELE DAVIS and Rogers became romantically involved in December 2015, and Rogers began living with DAVIS shortly thereafter.

3. John Rogers was involved in the sale of fraudulent sports memorabilia.

4. At some point not long after Rogers and AMBER MICHELE DAVIS met, John Rogers explained to DAVIS and Individual 1 that he was in trouble for committing fraud, including the creation of memorabilia item forgeries.

5. On March 6, 2017, John Rogers pleaded guilty in the Northern District of Illinois, Case No. 1:16-cr-00575, to his role in a scheme to defraud banks and individual investors out of approximately \$25,000,000.

B. THE CHARGE

From approximately May 2016 until approximately September 2017, in the Eastern District of Arkansas and elsewhere, the defendant, AMBER MICHELE DAVIS, with intent to defraud,

voluntarily and intentionally participated in a scheme to defraud and to obtain money by false and fraudulent pretenses and representations.

C. THE SCHEME

The following occurred as a part of and in furtherance of the scheme:

1. At the direction of John Rogers, Individual 1 represented to various individuals in the Eastern District of Arkansas and elsewhere that he had authentic sports memorabilia to sell.

2. In reality, the items were created from materials that were purchased and modified to appear to be historic items.

3. AMBER MICHELE DAVIS's role in the scheme was to help create and deliver items, open financial accounts for the deposit of fraud proceeds, and withdraw money obtained from victims.

4. The defendant, AMBER MICHELE DAVIS, was involved in the creation of approximately 25 to 35 fake sports memorabilia items during her time working with John Rogers.

5. The fake items included two Super Bowl I footballs, three Boston Celtics basketballs, at least two Notre Dame footballs, at least three baseballs associated with famous athletes, at least three travel trunks attributed to different athletes, several pieces of memorabilia related to the University of Arkansas, a John F. Kennedy briefcase, and invoices for six movie prop guns.

6. Some of the money that Individual 1 made from selling the forged items for John Rogers was sent to a bank account AMBER MICHELE DAVIS created at John Rogers's direction and another bank account belonging to AMBER MICHELE DAVIS.

D. THE WIRE

On or about the following date, in the Eastern District of Arkansas, the defendant, AMBER MICHELE DAVIS, having participated in the above-described scheme to defraud and to obtain money by false and fraudulent pretenses and representations, for the purpose of executing and in order to effect the scheme, knowingly caused the following wire.

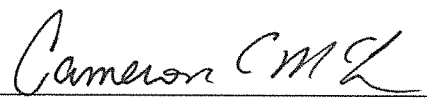
Count	Date	Amount	Wired From	Wired To
1	8/3/2016	\$9,000.00	Paragon Auctions.com LLC (account at Bank of America)	DAVIS's account at Arkansas Federal Credit Union

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE ALLEGATION

Upon conviction of Count 1 of this Information, the defendant, AMBER MICHELE DAVIS, will forfeit, under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

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